

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
ANDRE TILAHUN,)
Defendant)
Criminal No. 21-MJ-2295-MBB

GOVERNMENT'S MOTION TO SEAL
COMPLAINT

The United States Attorney hereby respectfully moves the Court to seal the complaint, supporting affidavit, this motion and the Court's order on this motion, and any other paperwork related to this matter, until further order of this Court, except that the United States may later produce copies of these documents during criminal discovery. As grounds for this motion, the government states that public disclosure of these materials might jeopardize the ongoing investigation of this case, as well as the government's ability to arrest the defendant.

The United States Attorney further moves pursuant to General Order 06-05 that the
United States Attorney be provided copies of all sealed documents that the United States
Attorney has filed in the above-styled matter.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney

By: /s/ Benjamin A. Saltzman
Benjamin A. Saltzman
Assistant U.S. Attorney

Date: May 3, 2021

Allowed
Date: May 3, 2021

